

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Samuel Jacob Mull, Jr.

**Debtor(s)**

**Chapter 13**

**Case No.** 23-13371-PMM

**Matter:** Motion to Pay

**DEBTOR(S)' AMENDED MOTION TO PAY**

AND NOW, come the Debtor(s), Samuel Jacob Mull, Jr., through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Amended Motion to Pay and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about November 7, 2023.
- 2) Debtor, Samuel Jacob Mull, Jr., receives regular income from employment with **East Penn Manufacturing Co.**, which may be attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan. Debtor(s) have proposed a Plan under which a portion of future earnings or wages is to be paid to the Standing Chapter 13 Trustee, for the benefit of creditors, in the amount of **\$189.69** from each **weekly** paycheck.
- 3) The likelihood of success in this case will be much greater if Debtor's income is attached to fund the Plan, and Debtor consents to the wage attachment.
- 5) Debtor's employer should be ordered to deduct from Debtor's future earnings or wages the periodic amount proposed by the Plan filed herein, and to pay said amount forthwith to the Standing Chapter 13 Trustee appointed by the Court and continue such periodic deductions and payments until such time as the Plan submitted by Debtor is consummated, or until further order of the Court.

WHEREFORE, the Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to pay the Standing Chapter 13 Trustee in the amount set forth in the attached Order.

Respectfully submitted,

Date: March 21, 2024

/s/ Samuel Jacob Mull, Jr.

Debtor

**DETHLEFS PYKOSH & MURPHY**

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

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**ORDER OF COURT**

UPON CONSIDERATION of the above-referenced Debtor(s) having filed a Plan under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor, Samuel Jacob Mull, Jr., receives income from:

East Penn Manufacturing Co.  
Attn: Payroll Department  
102 Deka Road  
Lyon Station, PA 19536

Should deduct from said Debtor 1's income the sum of **\$189.69** from each **weekly** paycheck, or such other sums as Debtor may from time to time direct, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to Debtor, and to remit the deductible sums to:

Scott F. Waterman, Esquire  
Standing Chapter 13 Trustee  
PO Box 680  
Memphis, TN 38101

IT IS FURTHER ORDERED that the entity from whom Debtor receives income shall notify the Standing Chapter 13 Trustee if Debtor's income is terminated and the reason, therefore. IT IS FURTHER ORDERED that all remaining income of Debtor except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to said Debtor in accordance with usual payment procedure. IT IS FURTHER ORDERED that the employer will place the Bankruptcy Case Number and the name of the Debtor(s) on all checks being forwarded to the Standing Chapter 13 Trustee to ensure proper accounting of the funds.

Date:

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Patricia M. Mayer, Bankruptcy Judge

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**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, March 21, 2024, I served a true and correct copy of the **Debtor(s)' Amended Motion to Pay and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail  
East Penn Manufacturing Co.  
Attn: Payroll Department  
102 Deka Road  
Lyon Station, PA 19536

Via Electronic Means  
Scott F. Waterman, Esquire  
Standing Chapter 13 Trustee  
2901 Saint Lawrence Avenue  
PO Box 4010  
Reading, PA 19606

Office of the United States Trustee  
Robert NC Nix, Sr. Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire